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April 28, 2021

**Via ECF**

Honorable Alison J. Nathan  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2102  
New York, NY 10007

**Re: *CSX Transportation, Inc. v. Newhaven Distribution Services, Inc.***  
**U.S.D.C. Southern District of New York; Case No. 1:20-cv-07123**  
**Our File No. 1326.538**

Dear Judge Nathan,

Pursuant to Fed. R. Civ. P. 6(b), L.R. 7.1(d), and the Court's Individual Rules of Practice at ¶1(D), the parties, by and through their respective counsel, respectfully move the Court for an Order modifying the current Scheduling Order (ECF No. 17) as follows:

<b><u>Event</u></b>	<b><u>Current Deadline</u></b>	<b><u>Proposed Deadline</u></b>
Deposition Deadline	<b>May 14, 2021</b>	<b>July 23, 2021</b>
Fact Discovery Deadline	<b>June 21, 2021</b>	<b>August 23, 2021</b>
Expert Discovery Deadline	<b>August 5, 2021</b>	<b>October 5, 2021</b>

This is the first request for an extension of time in this matter. The requested extensions will not prejudice any party. The parties mutually agree that the above requested extensions are necessary in this matter and jointly consent to extending these dates.

Respectfully Submitted,

s/ Nicholas J. Hubner

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